

Rice Pesticides Program 2006

**Date
established**

March 28, 2006

Enclosure to

ENF 06- 07

Distribution

County Agricultural Commissioners

Referrals

If you have any questions pertaining to this letter, please contract the Enforcement Branch Liaison assigned to your county.

Approval

Original Signature by

Scott T. Paulson, Chief
Enforcement Branch
(916) 324-4100

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Rice Pesticides Program 2006, Continued

Introduction

Enclosed are the 2006 recommended permit conditions for rice pesticides:

- Handler Worker Safety
 - Molinate (Ordram[®])
- Water- Holding
 - Molinate and Thiobencarb
 - General Water-holding Requirements
 - Methyl Parathion
- Drift Mitigation
 - Certain Rice Pesticides
 - Phenoxy/Dicamba
 - Thiobencarb
 - Methyl Parathion

Approved Resolution

On March 17, 2006, the Central Valley Regional Water Quality Control Board (CVRWQCB) approved Resolution No. R5-2006-0026 requiring continued management practices for rice pesticides. The CVRWQCB will E -mail the final resolution to the rice counties when it is available. You may consider it as Enclosure A.

Cooperation Between DPR and CVRWQCB

The Department of Pesticide Regulation (DPR) in cooperation with the CVRWQCB developed recommended permit and water management conditions to meet water quality management objectives for Molinate, Thiobencarb, Methyl Parathion, and Malathion. These conditions reflect management practices required by the current Board Resolution. DPR and CVRWQCB believe that use of these permit conditions will meet water quality management objectives for these rice pesticides.

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Rice Pesticides Program 2006, Continued

Rice Pesticide Water Monitoring and Annual Reporting

CRC Responsibility	<p>The rice industry, via the California Rice Commission (CRC), will be responsible for leadership in water monitoring, annual reporting to the CVRWQCB, and coordinating the participation of all program stakeholders.</p> <ul style="list-style-type: none">• The rice industry is ultimately responsible for meeting water quality objectives.• DPR, as a co-regulator with the water boards, will continue to use its authority to regulate the sales and use of pesticides to address water quality issues involving pesticides. DPR will continue to actively participate with CVRWQCB and the rice industry staff to address rice pesticide issues.
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Molinate Voluntary Cancellation - Status

Molinate Voluntary Cancellation	<p>The sale and distribution of molinate products will be phased out. Use of molinate will end on August 31, 2009. This phase-down period will allow rice growers time for transition to registered alternatives to molinate and any new alternatives that may be developed.</p>
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Seepage Mitigation Requirements

Seepage Defined	<p>The American Society of Agricultural Engineer's Standard section 5226.2 defines seepage as, "Water escaping below or out from water conveyance facilities, such as open ditches, canals, natural channels, and waterways."</p> <p>For purposes of mitigating seepage in rice production:</p> <ul style="list-style-type: none">• Seepage is lateral movement of irrigation water through a rice field levee or border to an area outside the normally flooded production area. Seepage can occur through levees into adjacent dry fields or into adjacent drains and canals.
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Rice Pesticides Program 2006, Continued

Seepage Documentation

DPR requests that county agricultural commissioners (CACs) continue monitoring for seepage when inspecting for water-holding compliance by:

- Checking for seepage or collection of seepage, that occurs through the outer borders of a field or the bottom border located at the lowest part of the field.
 - Using the water-holding inspection logs to document seepage observations. The Pesticide Use Monitoring Inspection Form (PR-ENF-104) may also be used to document seepage observations. Indicate “water-hold inspection” on the blank line under “application inspection.”
 - Document in the “Remarks” section on either form: Seepage flow less than five gallons per minute, or seepage flow more than five gallons per minute.
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Enforcement Action

DPR requests the rice counties in the Sacramento Valley take enforcement action against all growers for first-time and repeat violations of water-holding permit conditions.

Any visible seepage, moving offsite during the water-holding period that drains into waters of the State, is considered an early release and is a water-holding violation.

Reporting

Please report all “completed” water-holding enforcement actions to the CVRWQCB within 30 days after enforcement action is completed. Send enforcement actions to:

Ms. Amanda Smith
Central Valley Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive #200
Rancho Cordova, California 95670-6114.

DPR data reporting guidelines for the rice pesticides program will be sent to commissioners in the rice-producing counties as a separate letter in mid-May. DPR will provide this information to the CRC for use in compiling its report to the CVRWQCB as required by the Board’s resolution. CACs are encouraged to provide the requested information as expeditiously as possible.

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Rice Pesticides Program 2006, Continued

Brochure	Please continue to distribute the brochure, <i>Seepage Water Management, Voluntary Guidelines for Good Stewardship in Rice Production</i> , Publication 21568, to growers at the time of permit issuance.
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Thiobencarb Drift Mitigation Requirements

Mandatory Preseason Thiobencarb Stewardship Training	<ul style="list-style-type: none">• Restricted material permits for the use of thiobencarb should not be issued to growers who have not received CRC certification by attending a Thiobencarb Stewardship Meeting.• The CAC may certify growers who did not attend a Thiobencarb Stewardship Meeting by having them view a video of the preseason Thiobencarb Stewardship Meeting.
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General Information

Clincher	For 2006, Butte, Colusa, Glenn, Sutter, Yolo, and Yuba counties will require permits for Clincher [®] CA Herbicide, EPA Registration No. 62719-356-AA. Application of Clincher [®] will be limited to ground application only in these counties. However, limited aerial application of Clincher [®] will be allowed in designated study area(s) in each county (except for Sutter and Yuba counties) under specific aerial application permit conditions issued by the commissioner.
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Regiment	For 2006, Sutter county will require a restricted material permit for Regiment [®] CA Herbicide, EPA Registration No. 59639-105-AA. Application of Regiment [®] will be limited to ground application only. However, limited aerial application of Regiment [®] will be allowed in designated area(s) in Sutter county only, under specific aerial application permit conditions issued by the commissioner.
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Malathion Water Management Recommendations

CVRWQCB has approved a water management practice for malathion applied to rice that will help meet water quality performance goals for malathion in surface water. Malathion is currently not a restricted material and not subject to permit conditions. However, it is important that growers comply with the following water management practice:

- All water from fields treated with pesticides containing malathion should be retained on the site of application or contained within a tailwater recovery system, or other system, adequate to prevent discharge to waters of the State for four days following application.
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Storm Event Work Group

The Communication Plan developed by the Storm Event Work Group will be utilized in the event of a severe storm occurrence. The Storm Event Work Group will continue to meet as needed. Currently the work group is comprised of staff from the Regional Water Board, DPR, University of California, a reclamation district representative, CACs, and the rice industry. The California Rice Commission will take the lead in facilitating this group.

One-Page Summaries

Enclosure B summarizes the PPE required by Ordram[®] 15-G, Ordram[®] 8-E PPE labeling, and DPR's recommended permit conditions for molinate. Enclosure C summarizes the recommended water-holding permit conditions for molinate and thiobencarb. The summaries can be used as quick references. Please refer to the specific permit conditions and pesticide labeling for a complete explanation of the requirements.

Topic	See Enclosed
Personal protective equipment required by Ordram labeling and recommended permit conditions for molinate	B
Water-holding permit conditions for molinate, thiobencarb, methyl parathion, and malathion	C

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Permit Conditions

Please refer to the following recommended permit and water management conditions when issuing 2006 permits:

Topic	See Page
Molinate Worker Safety Permit Conditions	1
Molinate Water Management Permit Conditions	6
Thiobencarb Water Management Permit Conditions	11
Methyl Parathion Water Management Permit Conditions	15
General Water-Holding Permit Conditions	16
Pesticides Applied to Rice in the Sacramento Valley Drift Minimization Permit Conditions	17
Thiobencarb Drift Minimization Permit Conditions	19
Methyl Parathion Drift Mitigation Permit Conditions	20
Phenoxy/Dicamba Herbicides Permit Conditions	21
Malathion Water Management Recommendation	22
